

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA**  
Alexandria Division

DAVID P. DONOVAN,

Plaintiff,

v.

BETH A. WILKINSON,

Defendant.

Civil Action No. 1:20-cv-1344

**MOTION TO FILE DEFENDANT BETH A. WILKINSON'S OBJECTIONS TO  
PLAINTIFF'S PROPOSED REDACTIONS OF THE RECORD**

Pursuant to Local Civil Rule 5(C), Defendant Beth Wilkinson, by undersigned counsel, hereby moves to file her Objections to Plaintiff's Proposed Redactions under seal.

Defendant is filing this motion out of an abundance of caution and to comply with her obligations under Local Rule 5(C), because Plaintiff has designated large portions of the existing record as confidential. Defendant does not believe it is necessary to seal any of the material contained in her proposed sealed filing. Pursuant to Local Civil Rule 5(C), the burden is on Plaintiff, as the designating party, to file a response to this motion complying with requirements (2), (3), and (4) of Local Rule 5(C).

Pursuant to Local Civil Rule 5(C), Defendant provides the following non-confidential description of the material that has been filed under seal: a memorandum setting out Defendant's position on redactions to existing filings in the record.

Dated: November 20, 2020

Respectfully submitted,

Beth Wilkinson

By: /s/ Thomas G. Connolly

Thomas G. Connolly (VA Bar No. 29164)

Thomas B. Mason (*pro hac vice forthcoming*)

Jared Paul Marx (VA Bar No. 91213)

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## **CERTIFICATE OF SERVICE**

I hereby certify that on this date, I caused a true copy of the foregoing to be served by email on the following:

Cathy A. Hinger  
Lela M. Ames  
WOMBLE BOND DICKINSON LLP  
1200 Nineteenth Street, NW, Suite 500  
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Dated: November 20, 2020

/s/ Thomas G. Connolly  
Thomas G. Connolly